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FORT JAMES CORPORATION

11 AND RELATED ENTITIES

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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19  
20 CROWN PAPER LIQUIDATING  
TRUST,

21 Plaintiff,

22 vs.

23 PRICEWATERHOUSECOOPERS LLP  
24 fka COOPERS & LYBRAND, et al.

25 Defendants.

Case No. C 02-3836 MMC

Case No. C 05-0798 MMC

**STIPULATION AND ORDER  
CONTINUING DEFENDANTS'  
MOTIONS FOR ATTORNEYS' FEES  
PENDING COURT APPROVAL OF  
SETTLEMENT**

Time: 9:00 a.m.

Courtroom: 7 (19<sup>th</sup> Floor)

Judge: Hon. Maxine M. Chesney

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28 JEFFREY H. BECK, Liquidating Trustee  
of the Crown Paper Liquidating Trust,

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Plaintiff,

vs.

FORT JAMES CORPORATION; FORT  
JAMES OPERATING COMPANY; FORT  
JAMES FIBER COMPANY; FORT  
JAMES INTERNATIONAL HOLDINGS  
LTD; AND MCGUIRE WOODS, LLP,

Defendants.

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Plaintiff Jeffrey H. Beck, Liquidating Trustee ("Plaintiff"), and defendants Fort James Operating Company, Fort James Fiber Company, and Fort James International Holdings, Ltd., (collectively, "Fort James Defendants") and McGuire Woods LLP ("MW," and collectively with the Fort James Defendants, "Defendants", and collectively with the Fort James Defendants and Plaintiff, the "Parties") stipulate as follows and respectfully request that the Court enter the Parties' proposed order appended hereto.

WHEREAS, on July 12, 2004, the Court dismissed with prejudice Case No. 02-03836 in favor of MW;

WHEREAS, on December 14, 2006, the Court entered judgment in Case No. 05-0798 in favor of Defendants;

WHEREAS, on December 22, 2006, the Court approved the Parties' stipulation to defer briefing and hearing dates for Defendants' to-be-filed attorneys' fees motions;

WHEREAS, on January 26, 2007, MW and the Fort James Defendants each timely filed an attorneys fees motion (collectively, the "Attorneys Fees Motions"), and scheduled the hearings on the Attorneys Motions for March 2, 2007;

1 WHEREAS, after the Defendants filed the Attorneys Fees Motions, the  
2 Parties and other affected entities ("Others") reached an agreement in principle to settle all  
3 litigation between and among them, including this action and the Attorneys Fees Motions,  
4 and based thereon, the Parties stipulated to continue the hearing on the Attorneys Fees  
5 Motions to April 27, 2007 to allow the Parties and Others to document and obtain court  
6 approval of their settlement, which stipulation was approved by this Court (the "Prior  
7 Stipulation");

8  
9 WHEREAS, after entering into the Prior Stipulation, the Parties and Others  
10 (i) finalized the terms of and documented their settlement (the "Settlement"), which  
11 Settlement (if approved by the Court) will, among other things, render the Attorneys Fees  
12 Motions moot, and (ii) filed a motion to withdraw the reference (the "Motion to Withdraw  
13 Reference") on the motion to approve the Settlement (the "Settlement Motion"), which if  
14 granted will result in this Court deciding the Settlement Motion;

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16 WHEREAS, the Motion to Withdraw Reference is pending;

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18 WHEREAS, with the current hearing date of April 27, 2007 for the  
19 Attorneys Fees Motions, Plaintiff's oppositions to the Attorneys Fees Motions are due  
20 April 6, 2007 and Defendants' replies are due April 13, 2007, and the Parties wish to avoid  
21 the incurrence of additional fees with respect to the Attorneys Fees Motions;

1 IT IS HEREBY STIPULATED AND AGREED that the hearing on the  
2 Attorneys Fees Motions shall be continued to June 15, 2007, and the briefing schedule for  
3 Plaintiff's oppositions and Defendants' replies shall be continued in accordance with the  
4 Local Rules for filing oppositions and replies.

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6 DATED: April 5, 2007

BEUS GILBERT PLLC

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8 By /s/ Albert J. Morrison  
9 Albert J. Morrison  
10 Attorneys for Plaintiff  
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12 DATED: April 5, 2007

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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14 By /s/ Theodore A. Cohen  
15 Theodore A. Cohen  
16 Attorneys for Fort James Defendants

17 DATED: April 5, 2007

KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP


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19 By /s/ James C. Krieg  
20 James C. Krieg  
21 Attorneys for Def. MCGUIRE WOODS LLP  
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1 Good cause appearing,  
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3 IT IS HEREBY ORDERED that the hearing on the Attorneys Fees Motions  
4 is continued to June 15, 2007, and the briefing schedule for Plaintiff's oppositions and  
5 Defendants' replies is continued in accordance with the Local Rules for filing oppositions  
6 and replies.  
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8 The Court notes, however, that although the above-referenced "Motion to  
9 Withdraw Reference" may be "pending" in the Bankruptcy Court, said motion has not  
10 been docketed by the Clerk of the District Court and, accordingly, has not been assigned to  
11 a district court judge. See Bankruptcy Local Rule 5011-2(a) (providing that when motion  
12 to withdraw is filed with Clerk of Bankruptcy Court, Clerk of Bankruptcy Court "shall  
13 transmit the motion" to Clerk of District Court, which assigns the motion to district judge  
14 pursuant to Assignment Plan).  
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16 DATED: April 6, 2007  
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19 Hon. Maxine M. Chesney  
20 United States District Judge  
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